

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LESLAW J. KORNECKI, Plaintiff, v. TEMPLE UNIVERSITY HOSPITAL, Defendant.	: : : : : : : : : : : :	Civil Action No.: 02-CV-3708
----------------------------------------------------------------------------------------------	----------------------------------------------------------	-------------------------------------

**DEFENDANT TEMPLE UNIVERSITY HOSPITAL'S
AMENDED PRE-TRIAL MEMORANDUM**

Defendant Temple University Hospital ("Temple") files this amended Pre-Trial Memorandum in order to add two exhibits. Temple incorporates its original Pre-Trial Memorandum in its entirety.

Temple was under the impression from Plaintiff's discovery responses and Pre-Trial Memorandum that Plaintiff was and continued to be employed by the Main Line Health System. Temple served a trial subpoena on Main Line Health and was surprised to learn that Main Line Health terminated Mr. Kornecki's employment on March 10, 2005. The Main Line Health documents have been marked as a new exhibit: Exhibit 133.

Since plaintiff has never supplemented his discovery responses concerning his employment since his position at Main Line Health, Temple has served a trial subpoena on Mr. Kornecki requesting that he produce records evidencing his wages and

income from January 1, 2005 to the present. The relevant subpoena and proof of service are identified as Exhibit 134 and the responsive documents will be attached thereafter, once Mr. Kornecki produces them at trial.

SUPPLEMENTAL EXHIBITS:

Exh. No.	Bates No.'s	Description of Exhibits
133.	MLH 018 – 090	Kornecki's Main Line Health Systems Records of Employment and Termination
134.		Subpoena to Kornecki re Employment and Wage Documentation from January 1, 2005 to the Present.

Respectfully submitted,

/s/ Cameron J. Etezady

Neil J. Hamburg

Cameron J. Etezady

I.D. No.'s 32175 & 202172
HAMBURG & GOLDEN, P.C.
1601 Market Street, Suite 3310
Philadelphia, PA 19103

(215) 255-8590

Counsel for Temple University
Hospital

CERTIFICATE OF SERVICE

I, Cameron J. Etezady, hereby certify that defendant Temple University Hospital's Amended Pre-Trial Memorandum has been filed electronically and is now available for viewing and downloading from the Court's Electronic Case Filing System. I further certify that a copy of the foregoing Amended Pre-Trial Memorandum was served by regular mail on July 10, 2006, on the following:

George Bochetto, Esquire
Bochetto & Lentz, P.C.
1524 Locust Street
Philadelphia, PA 19106
Attorney for Plaintiff,
Leslaw Kornecki

/s/ CAMERON J. ETEZADY
NEIL J. HAMBURG
HAMBURG & GOLDEN, P.C.